Message

From: ONeill, Sandra [ONeill.Sandra@epa.gov]

Sent: 5/30/2019 11:53:45 AM

To: Galloway, Carol [Galloway.Carol@epa.gov]; Laessig, Susan [Laessig.Susan@epa.gov]; Teter, Royan

[Teter.Royan@epa.gov]; Cobb, Christina [cobb.christina@epa.gov]; Dyer, Brian [Dyer.Brian@epa.gov]; Kyle, Lee [Kyle.Lee@epa.gov]; Corbin, Mark [Corbin.Mark@epa.gov]; Kenny, Daniel [Kenny.Dan@epa.gov]; Rosenblatt, Daniel

[Rosenblatt.Dan@epa.gov]; Chiu, Enid [Chiu.Enid@epa.gov]; Anderson, Brian [Anderson.Brian@epa.gov]; Ambrosino, Helene [Ambrosino.Helene@epa.gov]; Kanarek, Andrew [Kanarek.Andrew@epa.gov]; Schmid, Emily [Schmid.Emily@epa.gov]; Meadows, Sarah [Meadows.Sarah@epa.gov]; Baris, Reuben [Baris.Reuben@epa.gov]

Subject: RE: Dicamba ESA requirements

Thanks, Carol – perfect primer for the meeting invite to come. Liza will be sending notes from yesterday's call and I'll update the invite when those come out. Those notes may r. Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5 | Please let me know if there any additional questions this group would like to discuss.

Thanks and a pleasant day to all,

Sandra O'Neill 703 347 0141

From: Galloway, Carol

Sent: Wednesday, May 29, 2019 6:10 PM

To: Laessig, Susan <Laessig.Susan@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>; Cobb, Christina <cobb.christina@epa.gov>; Dyer, Brian <Dyer.Brian@epa.gov>; Kyle, Lee <Kyle.Lee@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Kenny, Daniel <Kenny.Dan@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Chiu, Enid <Chiu.Enid@epa.gov>; ONeill, Sandra <ONeill.Sandra@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>; Lennartz, Steven <Lennartz.Steven@epa.gov>; Ambrosino, Helene <Ambrosino.Helene@epa.gov>

Subject: Dicamba ESA requirements

Greetings all,

Enforcing the requirement to print the Bulletins Live! Two information has been identified as a significant concern for the SLAs on the last two SFIREG Dicamba Work Group calls, so I'd like to re-raise my questions in the email below.

In addition to the questions below, the SFIREG work group has raised a related question and have asked for clarification. They've asked:

How this (requirement to print the information on Bulletins Live!) differs from other references on the
dicamba labels to registrant websites for example, tank mixes and nozzles. Does that mean the
applicator must also retain a copy of the registrant website, or the DriftWatch website to prove
compliance with the label? SFIREG is requesting some type of written clarification or reference for
enforcement purposes.

Lunderstand Sandra will set up a call for us to discuss. Thanks!!

Carol

From: Galloway, Carol

Sent: Tuesday, April 09, 2019 9:41 AM

To: Ambrosino, Helene Ambrosino.Helene@epa.gov">Ambrosino.Helene@epa.gov; Teter, Royan Teter.Royan@epa.gov; Cobb.christina@epa.gov; Corbin, Mark Corbin.Mark@epa.gov; Kenny, Daniel Kenny.Dan@epa.gov; Rosenblatt, Daniel Rosenblatt.Dan@epa.gov; Chiu,

Enid < Chiu. Enid@epa.gov>; ONeill, Sandra < ONeill. Sandra@epa.gov>

Cc: Anderson, Brian (Anderson.Brian@epa.gov) < Anderson.Brian@epa.gov>; Steven Lennartz

(Lennartz.Steven@epa.gov) < Lennartz.Steven@epa.gov>

Subject: RE: Evaluating compliance with dicamba ESA requirements

Following up on the discussion we had last week, there seems to be one loose end. We saw that the Bulletins Live! website directions include a directive to print out the information, however there are no instructions about retaining the print out for a period of time.

To enhance the ability of inspectors to determine compliance, we should add to the directions on the Bulletins Live! website, the requirement to retain the record for a specific period of time. So, two questions for the group:

- 1. Can we require applicators to retain the printed information? How long should we require applicators to keep these records?
- 2. How difficult is it to change the directions on Bulletins Live!? If the decision is made to make this change, when could/should this change happen given we are in the middle of the growing season?

Thanks for your time and attention to clarifying this issue.

Carol Galloway 913-551-5092 Pesticides, Waste and Toxics Branch Office of Compliance

EPA National Ag Center https://www.epa.gov/agriculture

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